

D. G. SWEIGERT, C/O
MAILBOX, PMB 13339
514 Americas Way, Box Elder, SD 57719
Spoliation-notice@mailbox.org

August 23, 2023

Sweigert v. Goodman et al, 23-cv-05875-LTS

Honorable Laura Taylor Swain
U.S. District Chief Judge
U.S. District Court
500 Pearl Street
New York, N.Y. 10007
Via ECF filing and e-mail to Chambers @nysd.uscourts.gov

SUBJ: Request for Leave of the Court to file a letter motion for reconsideration of ORDER ECF no. 4

Your Honor,

1. Jason Goodman of the social media show “CrowdSource The Truth” is the Defendant. Goodman publishes videos about his numerous S.D.N.Y. lawsuits, the latest example is attached as EXHIBIT ONE which demonstrates that Mr. Goodman has a violent lack of impulse control. Beginning at time-mark 16:00 the viewer will observe Mr. Goodman attempt a violent assault on a young woman using the excuse she is riding her bike on the side walk. Thankfully, a N.Y.P.D. uniformed officer was nearby to thwart Mr. Goodman’s assault (EXHIBIT ONE).

2. Today Mr. Goodman published a series of death threats directed at the undersigned on his Twitter account, see EXHIBIT TWO.

3. The undersigned requests that pursuant to Federal Rule of Civil Procedure 60(b) the Court extend the deadline of ECF no. 4 in light of Mr. Goodman’s recent death threats and the video example of his violent behavior, which constitute “exceptional circumstances”. No undue hardship will be imposed on the non-moving party as a result.

4. This letter seeks a seven (7) day extension of the deadline articulated in the ORDER ECF no. 4 to provide the undersigned additional time to confer with legal counsel concerning the risk of continuing with this lawsuit in light of these latest death threats and violent images.

5. Examples of exceptional circumstances include: threats to personal safety, where the "petitioner or beneficiary is facing an imminent threat to personal safety". Failure to grant this relief will cause the undersigned extreme hardship. *Ahmed v. Cissna*, 327 F. Supp. 3d 650 (S.D.N.Y. 2018).

August 23, 2023 (08/23/2023)

A handwritten signature in black ink, appearing to read "D. G. Sweigert". The signature is written in a cursive style with a large, stylized "S" and "W".

**D. G. SWEIGERT PRO SE PLAINTIFF, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

EXHIBIT ONE

https://www.youtube.com/watch?v=O_-VuZ_UQ

Time mark 16:00 forward

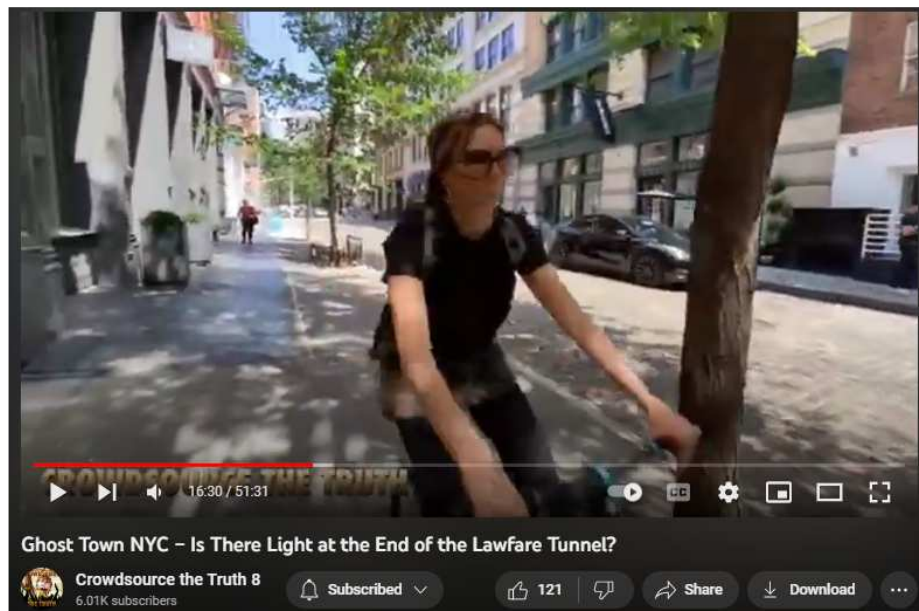


EXHIBIT TWO







CERTIFICATE OF SERVICE

It is hereby certified under the penalties of perjury that a true copy PDF file has been sent via e-mail message to the following:

Jason Goodman, sole stockholder of MULTIMEDIA SYSTEM DESIGN, INC.

truth@crowdsourcethetruth.org

Georg.webb@gmail.com

Certified under penalties of perjury.

August 23, 2023 (08/23/2023)



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